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Dear Sir

**HARINGEY LOCAL PLAN EXAMINATION: POST HEARING MODIFICATIONS CONSULTATION
UNITS A, B & C BRANTWOOD ROAD, TOTTENHAM, LONDON, N17 0DY**

Thank you for providing us with the opportunity to respond to the London Borough of Haringey's Local Plan Post Hearing Modifications Consultation.

We write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have an interest in the site comprising Units A, B and C at Brantwood Road. They have been working to develop initial proposals for its potential redevelopment.

As part of the ongoing Examination of the Haringey Local Plan, we understand that the Council is seeking comments on the proposed Post Hearing Main Modifications to the four Development Plan Documents which comprise the Local Plan submission. In this letter, we provide representations to the proposed modifications to the Alterations to Strategic Policies DPD, Development Management Policies DPD, the Site Allocations DPD and the Tottenham Hale Area Action Plan.

Site

The site is located on the northern boundary of the Tottenham Hale Employment Area and currently comprises a series of one storey industrial units (Class B1, B2, B8 and Sui Generis). Access to the site is provided via Brantwood Road. The site has a PTAL rating of 3 and is located within 800m of White Hart Lane Station, Northumberland Park Station and Silver Street Station. The site is also well located in terms of the strategic highway network, including accessible from both the A406 and A10.

The site is located approximately 1km north of Bruce Grove Town Centre and associated facilities. The site is not located within a Conservation Area and does not contain any statutorily or locally listed buildings. With regards to the Environment Agency's Flood Map, the site is located within Flood Zone 1 (i.e. it has the lowest probability of river or sea flooding).

The site is bound by existing residential dwellings along Middleham Road to the north, existing employment uses to the east and west and Brantwood Road to the south, with the wider Tottenham Hale Employment Area beyond this.

Emerging Allocation

The site is currently allocated as a Strategic Industrial Location (SIL) within the adopted Local Plan Strategic Policies (2013), forming part of the wider Tottenham Hale SIL.

Within the Pre-Submission Version of the Alterations to Strategic Policies DPD (January 2016) the Tottenham Hale Employment Area is classed as Part SIL/Part Regeneration Area. The Alterations to Strategic Policy 8 state a Regeneration Area is the most flexible category as it can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses.

However, the Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) seeks to remove this more flexible allocation and retain the entire Tottenham Hale Employment Area as a SIL. Whilst we support the strategic role of designated industrial locations, we consider that our site would be appropriate for alternative uses, including residential. The Schedule of Modifications proposed to the Alterations to Strategic Policies DPD is therefore considered unsound as it does not represent the most appropriate strategy for the site, and does not promote sufficient flexibility.

Comments on Proposed Alterations: Employment Policies

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area. Paragraph 173 requires careful consideration of viability and costs. Plans should be deliverable and the scale of development identified in the Plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened.

Proposed Policy DM38 (contained within the Development Management Policies DPD Pre-Submission Version and the Schedule of Modifications) seeks to allow employment-led regeneration on sites designated as Regeneration Areas only. This will replace Saved UDP Policy EMP4 which previously allowed some flexibility and potential for mixed use development on all employment sites if:

- the site is no longer suitable for business or industry use;
- well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months; and
- the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits.

As a result, we do not agree with the approach set out in Draft Policy DM38 which only applies to Regeneration Areas, meaning SILs are covered by a blanket restriction for employment use only. This is not considered to be compliant with Paragraph 22 of the NPPF which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. Therefore, allowance for greater flexibility in terms of a mix of uses should therefore be incorporated into the policy, as per Saved UDP EMP4. This would not inhibit the ability of the site to re-provide employment generating uses where there is market demand, but would optimise the sites potential for being brought forward for housing, which is considered to be of key importance given the considerable requirement for new housing within the borough and London as a whole.

The Tottenham Hale Employment Area should be acknowledged within emerging policy as having the potential to provide a range of other compatible uses alongside residential. Class A and Class D uses also have the potential to provide employment opportunities so should be encouraged where appropriate.

The site is also located to the north of the Tottenham Hale Area Action Plan (AAP) boundary area. One of the aims of this document is to identify land for both intensification and diversification of existing industrial estates. The AAP states the Council will need to facilitate a step-change in the local employment offer, including re-classifying some employment areas to allow a wider range of employment generating uses on site and to help facilitate regeneration led-mixed use development. It is considered that this flexibility should be allocated to all employment sites, including SILs, within the borough based on viability and available marketing evidence.

Whilst it is appreciated that there is a requirement to explore the feasibility and viability of re-providing some employment generating uses as part of any redevelopment proposals for the site, the Mayor acknowledges in his draft 'A City for all Londoners' document that whilst recognising the need to promote economic growth, the economy is changing and land must be used intelligently, particularly in the context of a housing crisis. The Mayor advises that in some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. As such, the Mayor encourages creativity in how we think about space and promotes mixed-use activity. Furthermore, it is considered that mixed use development which comprised employment floorspace at ground floor with residential use on the upper floors would be appropriate on the site considering the neighbouring uses which comprise both residential and existing employment land uses.

Comments on Proposed Alterations: Housing Delivery

The site is located within the Mayor's 'Tottenham Housing Zone' which seeks to deliver 1,965 new homes in the area. This sets out that mixed development opportunities are available for developers across the zone and site specific allocations should therefore allow for a more flexible range of uses, including housing. The allocation of the site should promote flexibility and seek to optimise development potential. A design-led approach should be encouraged, which would then inform the overall density of housing schemes coming forward.

The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) sets out an annual target for 1,502 units per annum from 2015 – 2026 for the London Borough of Haringey. Whilst this accords with the annual average housing supply monitoring target set out in Table 3.1 of the London Plan, we consider that an increased target is required in order to meet the needs of the borough and London as a whole.

There is a consensus that London's adopted housing target of 42,000 new homes a year is too low. The London SHMA, published in 2013, states that London needs between 49,000 and 62,000 new homes a year to address the backlog of housing shortfall over a period of 10 or 20 years. Other assessments estimate an even higher need: employment-driven forecasts made pre-referendum by Oxford Economics indicate an annual housing need of 64,000 a year over the next five years with no allowance for meeting the backlog; and to clear the backlog since 2011 in five years, the TCPA puts London's housing need at 87,000 a year. We therefore estimate that London should be delivering more than 60,000 new homes a year if we are to meet need and address the imbalances in the housing market that have resulted from the ongoing undersupply of homes. Therefore, we strongly feel that London Borough of Haringey has a responsibility to assist in conquering the chronic housing shortage facing London as a whole.

It is therefore considered that the Council's overall housing target should be corrected upwards in line with the above and in the spirit of significantly boosting housing supply, as sought by the NPPF.

Finally, the NPPF states that in order to be developable, a site should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed. The site at Units A, B and C Brantwood Road is considered to be developable and the site presents an opportunity to significantly contribute to the Council's housing shortfall within a sustainable, brownfield location.

Future Participation

We trust that the above is of assistance in the preparation of the Haringey Local Plan. We would like to be kept up to date with progress and look forward to further opportunities to engage and look forward to confirmation of receipt of these representations. Please feel free to contact myself or my colleague, Lucy Aspden (0207 299 3094), of these offices if you have any queries or would like to discuss.

Yours sincerely

Diana Thomson
Associate Director

cc. Richard Summers, JLL
Louise Hallam, JLL